

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD GREEN, ESQUIRE,	:	<b>CIVIL ACTION NO.: 02-cv-4590</b>
	:	
<i>Plaintiff,</i>	:	
	:	
vs.	:	
	:	
ZURICH AMERICAN INSURANCE COMPANY,	:	
	:	
<i>Defendant.</i>	:	

**JURY INTERROGATORIES**

Each of the following questions are to be resolved by unanimous vote of a jury.

**I. AGE DISCRIMINATION**

1. Do you find that Plaintiff proved by a preponderance of the evidence that Defendant unlawfully discriminated against him because of his age?

Yes \_\_\_\_\_ No \_\_\_\_\_

Instructions:

If the answer to the above question is “Yes,” go to the next question.

If you answered “No” to Question 1, you need not proceed any further, but should enter a verdict for defendant.

2. Do you find by a preponderance of the evidence that the Defendant willfully violated the Age Discrimination in Employment Act, as defined in the jury charge?

Yes \_\_\_\_\_ No \_\_\_\_\_

Instructions:

If the answer is "Yes," proceed to next question.

3. Do you find that the defendant has articulated or advanced a legitimate business reason for its decision to terminate the Plaintiff?

Yes \_\_\_\_\_ No \_\_\_\_\_

Instructions:

If your answer to the above question is "No," stop at this point and return a verdict for Plaintiff.

If your answer is "Yes," proceed to the next question.

4. Do you find, by a preponderance of the evidence, that plaintiff has proved that defendant's legitimate business reason was a pretext for discrimination?

Yes \_\_\_\_\_

No \_\_\_\_\_

Instructions:

If your answer is "No," stop at this point and return a verdict for defendant.

If your answer is "yes," proceed to issue of damages.

**II. DAMAGES**

5. What amount of economic damages is Plaintiff entitled to recover from the Defendant to compensate him for his past lost wages through the present?

\$ \_\_\_\_\_

6. What amount of front pay is Plaintiff entitled to receive?

\$ \_\_\_\_\_

7. What amount of compensatory damages is the Plaintiff entitled to receive?

\$ \_\_\_\_\_

8. What amount if any do you award the Plaintiff as punitive damages?

\$ \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 2003

Respectfully submitted,

LOVITZ & GOLD, P.C.

BY: \_\_\_\_\_

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